

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MAKE THE ROAD STATES, INC.,
NAACP BUCKS COUNTY BRANCH
2253, BUXMONT UNITARIAN
UNIVERSALIST FELLOWSHIP,
and JUAN NAVIA,**

Plaintiffs,

v.

**FREDERICK A. HARRAN,
individually and in his official
capacity as Sheriff of Bucks County,
and BUCKS COUNTY,**

Defendants.

No. 2:25-cv-02938

**DECLARATION OF KEITH ARMSTRONG
IN SUPPORT OF PETITION FOR AWARD OF ATTORNEY'S FEES**

I, Keith Armstrong, am one of the attorneys of record for the plaintiffs in the above-captioned case. I make the following declaration upon my personal knowledge:

1. This declaration is submitted in support of Plaintiffs' Petition for Attorneys' Fees.
2. I am a Fellowship Attorney – Immigrants' Rights, at the ACLU of Pennsylvania, where I have worked as an attorney since October 2023. I previously served as a legal fellow and then Staff Attorney in the federal litigation unit at RAICES, a Texas-based immigrants' rights organization, from September 2021 to October 2023.
3. I graduated from the Northwestern University Pritzker School of Law *cum laude* in 2021 and earned my undergraduate degree from Macalester College.
4. I certify that the attached time sheets, which are incorporated by reference, were prepared contemporaneously and maintained in the ordinary course of business.

5. The hours we have billed in this case are fair and reasonable and were necessarily incurred in the successful prosecution of this case.
6. Only the time spent on this case that could reasonably be billed to a private client has been included.
7. Based on my experience and standing in the bar, I believe that the requested rate of \$315 per hour is fair and reflects the prevailing community rate for civil rights lawyers of comparable skill and experience.
8. I am currently admitted to practice in Pennsylvania and Illinois; in the United States District Courts for the Eastern, Middle, and Western Districts of Pennsylvania; the United States District Court for the Western District of Texas; and before the Fifth Circuit Court of Appeals.
9. I am a salaried employee of the ACLU of Pennsylvania, a nonprofit, nonpartisan organization dedicated to defending and protecting our individual rights and personal freedoms. We do not charge our clients, and have not done so in this case. Consequently, I am subject to the “community market rate rule” for determining my fee rate.
10. My hourly rate of \$315 per hour reflects the community market rate for attorneys of comparable skill and experience. This rate is based on knowledge of rates charged by legal nonprofits in Philadelphia with similar levels of experience and educational backgrounds.
11. My total billable hours for the U.S. District Court proceedings in this case are 5.7. The total amount (lodestar), as calculated by multiplying the hours times the prevailing billing rate of \$315, is \$1,795.50.

12. For the foregoing reasons, I believe that my requested hourly rate of \$315 is fair, reasonable, and well within the scope of rates given to federal court litigators with similar experience, skill, and standing in the Philadelphia legal community.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 2, 2025

Respectfully submitted,

By: /s/ Keith Armstrong

Keith Armstrong (Pa. No. 334758)
AMERICAN CIVIL LIBERTIES UNION
OF PENNSYLVANIA
P.O. Box 60173
Philadelphia, PA 19102
215-259-8173
karmstrong@aclupa.org

***Make the Road v. Harran* – Keith Armstrong Attorney Time - E.D. Pa.**
Hourly Rate = \$315

Date	Description	Time	Amount
06/09/2025	Review, annotate, and conduct preliminary research on Defendants' Notice of Removal	1.10	\$ 346.50
06/10/2025	Review and digest amended notice of removal; draft strategy email to legal team	0.60	\$ 189.00
06/11/2025	Legal Team Discussion regarding Remand Motion strategy	0.30	\$ 94.50
06/11/2025	Proposal regarding seeking fees on remand motion	0.10	\$ 31.50
06/12/2025	Review and finalize Entry of Appearance to the Eastern District of Pennsylvania	0.30	\$ 94.50
06/13/2025	Discussion regarding Briefing Schedule for remand motion	0.50	\$ 157.50
06/16/2025	Status Conference Before Judge Sanchez	0.50	\$ 157.50
06/16/2025	Debrief with Legal team after Status Conference	0.50	\$ 157.50
06/18/2025	Strategy calls with legal team regarding the Remand and Temporary Restraining Order	1.30	\$ 409.50
06/26/2025	Review, annotate, and commence research on Notice of USA Potential Participation	0.40	\$ 126.00
06/27/2025	Draft internal email regarding scheduling of Response to Sheriff's Association Intervention Motion	0.10	\$ 31.50
TOTAL		5.70	\$ 1,795.50